

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

07 CIV 3938

LILLIAN FEILER,

Plaintiff(s),

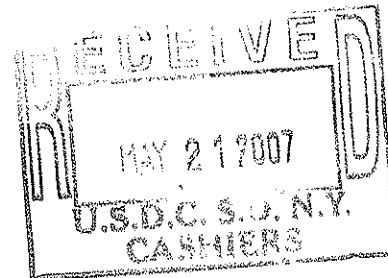
Civ.

JUDGE RUELIL

-against-

TARGET CORPORATION a/k/a TARGET STORES,

Defendant(s).



REMOVAL PETITION

To the Honorable Judges of the United States District Court for the Southern District of New York, the defendant, TARGET CORPORATION, by its attorneys, Connors and Connors, P.C., states the following upon information and belief:

1. That TARGET CORPORATION is a defendant in the above-entitled action.

2. On April 23, 2007 this action was commenced against TARGET in the Supreme Court of the State of New York, Bronx County, and is now pending. The action is captioned:

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

LILLIAN FEILER,

Plaintiff(s),

Index No.: 14331/07

-against-

TARGET CORPORATION a/k/a TARGET STORES,

Defendant(s).

3. On April 30, 2007, a summons and complaint was served in this matter on Target's designated agent, CT Corporation.

4. The defendant, TARGET, is filing this Notice of Removal within 30 days of service of the summons and complaint.

5. No further proceedings have been had in the Supreme Court of the State of New York, Bronx County.

6. The amount in controversy in this action exceeds the sum of \$75,000 exclusive of interests and costs.

7. Plaintiff is a citizen of New York State.

8. At the time the Complaint was filed, TARGET was incorporated in the State of Minnesota and upon information and belief, its principal place of business was also in the State of Minnesota.

9. This is an action for damages for personal injury resulting from the alleged negligence of the defendant.

10. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §1332, and the action may therefore be removed to this Court pursuant to 28 U.S.C. §1441.

11. A copy of the Summons and Complaint served on TARGET CORPORATION is annexed hereto.

12. This notice is filed with this Court within 30 days after service of the Complaint in this action.

WHEREFORE, TARGET prays that the above action now pending against it in the Supreme Court of the State of New York, County of Bronx, be removed to this Honorable Court.



**MICHAEL J. CAULFIELD (7206)**

Connors & Connors, P.C.  
Attorneys for Defendant  
TARGET CORPORATION  
766 Castleton Avenue  
Staten Island, New York 10310-9003  
(718) 442-1700

TO: FELDMAN, KRAMER & MONACO  
Attorneys for Plaintiff  
330 Motor Parkway  
Hauppauge, New York 11788

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
LILLIAN FEILER,

Plaintiff(s),

Civ.

-against-


TARGET CORPORATION a/k/a TARGET STORES,

Defendant(s).

\_\_\_\_\_  
SIRS:

**PLEASE TAKE NOTICE**, that upon the removal of this action from the Supreme Court of the State of New York, County of Bronx, to the United States District Court for the Southern District of New York, a Notice of Removal, a copy of which is annexed hereto was duly filed in the Office of the Clerk of the United States District Court for the Southern District of New York on the 21st day of May, 2007.

Dated: Staten Island, New York  
May 17, 2007

  
\_\_\_\_\_  
**MICHAEL J. CAULFIELD (7206)**  
Connors & Connors, P.C.  
Attorneys for Defendant  
TARGET CORPORATION  
766 Castleton Avenue  
Staten Island, New York 10310  
(718) 442-1700

TO: FELDMAN, KRAMER & MONACO  
Attorneys for Plaintiff  
330 Motor Parkway  
Hauppauge, New York 11788

CERTIFICATE OF SERVICE

I, **MICHAEL J. CAULFIELD**, hereby certify that a copy of the foregoing NOTICE OF REMOVAL was mailed by first class mail, postage prepaid, this 2<sup>nd</sup> day of May, 2007, to all counsel of record as indicated below.

  
\_\_\_\_\_  
**MICHAEL J. CAULFIELD (7206)**

TO: FELDMAN, KRAMER & MONACO  
Attorneys for Plaintiff  
330 Motor Parkway  
Hauppauge, New York 11788

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LILLIAN FEILER,

Plaintiff,

-against-

TARGET CORPORATION a/k/a TARGET STORES,

Defendant.

---

---

**NOTICE OF REMOVAL**

---

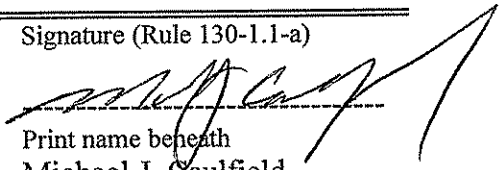
---

**CONNORS & CONNORS, P.C.**

*Attorneys for Defendant*  
*Office and Post Office Address, Telephone*  
766 Castleton Avenue  
Staten Island, New York 10310  
(718) 442-1700 PHONE  
(718) 442-1717 FAX

To

Signature (Rule 130-1.1-a)

  
Print name beneath

Attorney(s) for

Michael J. Caulfield

Service of a copy of the within

is hereby admitted,

Dated,

\_\_\_\_\_  
Attorney(s) for

Please take notice

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of a  
duly entered in the office of the clerk of the within named court on

☐ NOTICE OF SETTLEMENT

that an order  
settlement to the HON.  
of the within named court, at  
on

of which the within is a true copy will be presented for  
one of the judges

at M

Dated,

Yours, etc.

**CONNORS & CONNORS, P.C.**

*Attorneys for*

*Office and Post Office Address*

766 CASTLETON AVENUE

STATEN ISLAND, NEW YORK 10310

To

Attorney(s) for